


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED  
SCRANTON  
DEC 01 2021  
PER   
DEPUTY CLERK

NYHEIM REAVES,  
Plaintiff,  
v.

No. 3:21-CV-1282

JOHN WETZEL, et al.,  
Defendants.

Magistrate Judge Saporito, Jr.

DECLARATION IN SUPPORT OF PLAINTIFF'S  
MOTION FOR THE APPOINTMENT OF COUNSEL

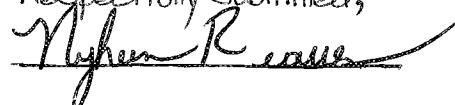
NYHEIM REAVES hereby declares:

1. I am the pro se Plaintiff in the above-captioned matter. I make this declaration in support of my motion for the appointment of counsel.
2. The amended complaint in this matter alleges that Plaintiff's diagnosed, serious mental illness has been deliberately ignored and woefully undertreated by prison officials who knowingly assigned Plaintiff to indefinite solitary confinement, in violation of Plaintiff's Eighth and Fourteenth Amendment rights.
3. This is a complex case because it contains several different legal claims, against several Defendants.
4. Plaintiff has demanded a jury trial.

5. The Plaintiff has only a high school education and has no legal education.
6. Plaintiff has a cognitive learning disability, which can be verified by prison records, that prevents him from properly preparing his own legal documents.
7. Plaintiff has been diagnosed with a serious mental illness, which can be verified by prison records, that also prevents him from properly preparing his own legal documents.
8. Plaintiff is currently housed in indefinite solitary confinement, and, as a result, has very limited access to legal materials, as well as to the prisoner who is writing this instant request, which will prevent him from filing properly prepared legal documents in the future.
9. As set forth in the accompanying Memorandum of Law, these facts, along with the legal merit of the claims set forth in the attached amended complaint, support the appointment of counsel in this case.
10. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, Plaintiff's Motion For The Appointment of Counsel should be Granted.

Date: November 29, 2021

Respectfully submitted,  


Nyheim Reeves

D.O.C. # LW9949

1200 Mokychic Drive

Collegexville, PA 19426

Wylheim Reaves  
D.O.C.# LW9949  
200 Mokychic Drive  
Collegeville, PA 19426

PA DEPARTMENT OF  
CORRECTIONS  
INMATE MAIL

RECEIVED  
11/29/2021  
FIRST-CLASS MAIL  
\$002.162  
POSTAGE  
ZIP 19426  
041M252211

RECEIVED  
SCRANTON

DEC 01 2021

PER.                      DEPUTY CLERK

U.S. District Court  
235 N. Washington Ave.  
P.O. Box 1148  
Scranton, PA 18501-1148